REMARKS

Status of Claims

Claims 1-16, 28, and 29 are pending in this application. No claim amendments are proposed herein. Reconsideration of the application is respectfully requested in view of the following remarks.

Rejection under 35 U.S.C. §102(e)

A.)   Applicable Authority

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdeggal Brothers v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). *See also*, MPEP § 2131.

B.)   Anticipation Rejection Based on U.S. Patent No 6,343,377

Claims 1 and 28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6, 343,377 to Gessner *et al.*, (hereinafter "Gessner").   As Gessner does not describe, either expressly or inherently, each and every element of the rejected claims, Applicant respectfully traverses the rejection as hereinafter set forth.

Independent claim 1 recites a system comprising a markup language core engine for providing categories of behaviors including layout and rendering behaviors; at least one external component designed to provide categories of external component behaviors including at least one of an external component layout behavior and an external component rendering

behavior in addition to the behaviors provided by the core engine; a pair of interfaces associated with each external component for communication between the external component and the core engine; and a mechanism included in the core engine to extend a selected category of behavior of the core engine with the behaviors of a same category of the at least one external component, such that the behaviors of the same category of the at least one external component participate with the behaviors of the core engine, wherein the mechanism and the at least one external component communicate through the pair of interfaces to confirm participation, and participation *includes the at least one external component delegating some processing of the behaviors of the same category to the core engine.* By way of contrast, Gessner is directed toward a system and method for manifesting content received via the Internet by an automatic data processing system that includes a content retrieval module for receiving content from the Internet. Gessner discloses core routines which provide core functionality such as content layout and rendition (Gessner, col.6 lines 45-48). The core routines further include a set of "replaceable delegates" that perform a certain core task for a software application environment (Gessner, col.5 lines 47-52; col.6 lines 48-50). Gessner further discloses that an external client can extend the functionality of the core routines by replacing a replaceable delegate with the external client's replacement delegate so that the replacement delegate can perform the functionality of the replaceable delegate that it has replaced (Gessner, Fig. 2, col.7 lines 11-15).

Gessner, however, does not describe, either expressly or inherently, a system wherein participation includes at least one external component delegating some processing of the behaviors of the same category to the core engine. It is alleged in the Office Action that Gessner's replacement delegate is equivalent to Applicant's external component. However, the replacement delegate does not delegate "some processing" of the behaviors of the same category

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to the core engine. The replacement delegate in fact completely replaces the replaceable delegate and takes over the entire corresponding core task. This teaches away from Applicant's invention.

The Specification of the present application teaches that the external component can process a behavior to any desired degree; the external component, for example, may completely override comparable behaviors supported by the core engine, or the behaviors supported by the external component may complement or supplement the comparable behaviors of the core engine to allow both the core engine and the external component to process the comparable behaviors. (Applicant's specification, page 8, line 16). As stated in claim 1, the external component provides a category of behavior while allowing the core engine to handle some processing of the behaviors of the same category. Gessner only describes an external component replacing the same category of behavior and *completely* handling the entire processing of the particular core task. Gessner, therefore, does not describe, either expressly or inherently, each and every element of independent claim 1.

With reference to claim 28, a computer-readable medium having one or more computer programs stored thereon for execution by a processor is recited. The computer-readable medium comprises a markup language core engine for providing categories of behaviors including layout and rendering behaviors; at least one external component designed to provide categories of external component behaviors including at least one of an external component layout behavior and an external component rendering behavior in addition to the behaviors provided by the core engine; a pair of interfaces associated with each external component for communication between the external component and the core engine; and a mechanism included in the core engine to extend a selected category of behavior of the core

engine with the behaviors of a same category of the at least one external component, such that the behaviors of the same category of the at least one external component participate with the behaviors of the core engine, wherein the mechanism and the external component communicate through the pair of interfaces, and *participation includes the at least one external component delegating some processing of the behaviors of the same category to the core engine.* By way of contrast, Gessner fails to describe, either expressly or inherently, a computer-readable medium comprising a mechanism wherein at least one external component participates with participation of a core engine, and wherein participation includes at least one external component delegating some processing of the behaviors of the same category to the core engine. As previously stated with regard to claim 1, Gessner instead describes a replacement delegate that completely replaces the replaceable delegate and takes over the entire corresponding core task. Accordingly, it is respectfully submitted that Gessner fails to describe, either expressly or inherently, each and every element of independent claim 28.

As Gessner fails to describe, either expressly or inherently, each and every element of independent claims 1 and 28, it is respectfully submitted that these claims are not anticipated by Gessner. As such, it is respectfully requested that the 35 U.S.C. § 102(e) rejection of these claims be withdrawn.

Rejection under 35 U.S.C. §103(a)

A.)   Applicable Authority

The basic requirements of a *prima face* case of obviousness are summarized in MPEP §2143 through §2143.03. In order "[t]o establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art,

to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success [in combining the references]. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)". *See* MPEP §2143. Further, in establishing a *prima face* case of obviousness, the initial burden is placed on the Examiner. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 USPQ 972, 972, (Bd. Pat App. & Inter. 1985)." *Id. See also* MPEP §706.02(j) and §2142.

   B.)   Obviousness Rejection Based on Gessner in view of U.S. Patent No. 6,161,126

        Claims 2-3, 7-10, 12, 13, 15, 16, and 29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gessner in view of U.S. Patent 6,161,126 to Weis et al. (hereinafter "Weis"). As the asserted references, whether taken alone or in combination, fail to teach or suggest all the limitations of the rejected claims, Applicant respectfully traverses the rejection as hereinafter set forth.

        Claims 2 and 3 each depend directly from claim 1. With regard to claim 1, it is respectfully submitted that Gessner fails to teach or suggest a system wherein participation includes at least one external component delegating some processing of the behaviors of the same category to the core engine. Rather, as previously set forth, Gessner teaches a system wherein a replacement delegate completely replaces the replaceable delegate and takes over the

entire corresponding core task. It is respectfully submitted that Weis fails to cure this deficiency, nor is it relied upon for such teaching.

As such, it is respectfully submitted that Gessner and Weis, whether taken alone or in combination, fail to teach or suggest all of the limitations of claim 1. As each of claims 2 and 3 depend from claim 1, it is respectfully submitted that the reference(s) also fail to teach or suggest all of the limitations of these claims for at least the above-cited reasons. *See, In re Fine*, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988); *see also*, MPEP § 2143.

In regards to independent claim 7, a method performed by a mechanism for extending a behavior of a core engine with a behavior of an external component, both the core engine behavior and the external component behavior belonging to the same category of behavior, the category being one of a layout behavior and a rendering behavior is recited. The method comprises calling a behavior initialization method of the external component to determine how the behavior of the external component participates with the behavior of the core engine, wherein the core engine behavior and the external component behavior belong to the same category of behavior and participation includes supplementing core engine behavior with external component behavior, wherein supplementing includes the at least one external component delegating some processing of the core engine behavior and the external component behavior, belonging to the same category of behavior, to the core engine in one mode, and *participation includes replacing core engine behavior with external component behavior in another mode*; calling a behavior method of the external component for the external component to provide the behavior of the external component when the core engine is providing the behavior of the core engine, so that the behavior of the external component participates with the behavior of the core engine; and, receiving a call to a corresponding behavior method of the

mechanism for the external component to communicate with the core engine during participation of the behavior of the external component with the behavior of the core engine. By way of contrast, Gessner teaches an external component replacing the same category of behavior and *completely* handling the *entire* processing of the particular category of behavior without allowing the core engine to handle any processing of the behaviors of the same category. Additionally, Weis neither cures nor is relied upon for curing this deficiency.

Accordingly, it is respectfully submitted that Gessner and Weis, whether taken alone or in combination, fails to teach or suggest all of the limitations of independent claim 7. Each of claims 8–10, 12, 13, 15 and 16 depend, either directly or indirectly from independent claim 7. As such, it is respectfully submitted that the reference(s) also fail to teach or suggest all of the limitations of these claims for at least the above-cited reasons. *See, In re Fine*, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988); *see also*, MPEP § 2143.

Claim 29 depends directly from claim 28. With regard to claim 28, it is respectfully submitted that Gessner fails to teach or suggest a computer-readable medium comprising a mechanism wherein at least one external component participates with participation of a core engine, and *wherein participation includes at least one external component delegating some processing of the behaviors of the same category to the core engine.* As previously stated, Gessner instead describes a replacement delegate that *completely* replaces the replaceable delegate and takes over the *entire* corresponding core task. It is respectfully submitted that Weis fails to cure this deficiency, nor is it relied upon for such teaching.

As such, it is respectfully submitted that Gessner and Weis, whether taken alone or in combination, fail to teach or suggest all of the limitations of claim 28. As claim 29 depends from claim 28, it is respectfully submitted that the reference(s) also fail to teach or suggest all of

the limitations of this claim for at least the above-cited reasons. *See*, *In re Fine*, 5 USPQ2d

1596, 1600 (Fed. Cir. 1988); *see also*, MPEP § 2143.

As Gessner and Weis, whether taken alone or in combination, fail to teach or

suggest all of the limitations of the rejected claims, it is respectfully submitted that a *prima facie*

case of obviousness of claims 2-3, 7-10, 12, 13, 15, 16, and 29 cannot be established based on

the asserted combination of references. Accordingly, withdrawal of the 35 U.S.C. § 103(a)

rejection of these claims is respectfully submitted.

C.) <u>Obviousness Rejection Based on Gessner in view of Weis in further view of
U.S. Patent 6,585,777</u>

Claims 4-6, 11, and 14 stand rejected under 35 U.S.C. § 103(a) as being

unpatentable over Gessner in view of Weis, in further view of U.S. Patent No. 6,585,777 to

Ramaley et al. (hereinafter "Ramaley"). As the asserted references, whether taken alone or in

combination, fail to teach or suggest all the limitations of the rejected claims, Applicant

respectfully traverses the rejection as hereinafter set forth.

Claims 4–6 depend directly from claim 1 and claim 14 depends indirectly from

claim 7. As previously stated, Gessner and Weis, whether taken alone or in combination, fail to

teach or suggest all of the limitations of claims 1 and 7. It is respectfully submitted that

Ramaley fails to cure this deficiency, nor is it relied upon for curing such deficiency.

Accordingly, it is respectfully submitted that Gessner, Weis and Ramaley,

whether taken alone or in combination, fails to teach or suggest all of the limitations of

independent claims 1 and 7. As each of claims 4–6 and 14 depends from one of claims 1 and 7,

it is respectfully submitted that the reference(s) also fail to teach or suggest all of the limitations
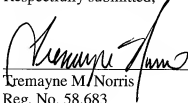
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of these claims for at least the above-cited reasons. *See, In re Fine*, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988); *see also*, MPEP § 2143.

As Gessner, Weis and Ramaley, whether taken alone or in combination, fail to teach or suggest all of the limitations of the rejected claims, it is respectfully submitted that a *prima facie* case of obviousness of claims 4–6 and 14 cannot be established based on the asserted combination of references. Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejection of these claims is respectfully submitted.

CONCLUSION

For at least the reasons stated above, claims 1 – 16, 28 and 29 are believed to be in condition for allowance, and an early notice thereof is respectfully requested. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned by telephone prior to issuing a subsequent action. It is believed that no fee is due in conjunction with the present amendment. However, if this belief is in error, the Commissioner is hereby authorized to charge any amount required to Deposit Account No.19-2112 referencing MFCP 87510.

Respectfully submitted,

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